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June 9, 2008

BY E-FILE

The Honorable Gregory M. Sleet
Chief Judge
United States District Court
for the District of Delaware
U.S. Courthouse
844 King Street
Wilmington, DE 19801

Re: Finjan Software Ltd. v. Secure Computing Corporation, et al.,
D. Del., C.A. No. 06-369-GMS

Dear Chief Judge Sleet:

Pursuant to the Court's Order of May 9, 2008 (D.I. 277), Finjan and Secure Computing have met and conferred on a security in support of the stay of execution pending post-trial motions pursuant to Rule 62(b) requested by Secure Computing in its motion filed April 7, 2008 (D.I. 247, 254, 255) and have not come to complete agreement regarding the terms of the security. In the motion papers, Secure Computing sought to secure the stay based on Secure Computing's ability to pay the judgment, while Finjan sought an escrow or a surety bond in 100% of the amount of the jury's verdict, \$9.18 Million.

While the parties have agreed on a third-party security in the amount of \$9.18 Million, the parties dispute the terms of the security as follows:

- Finjan proposes that Secure Computing place the verdict amount in escrow or post a bond in favor of Finjan for the full verdict amount.
- Secure Computing proposes an irrevocable letter of credit in favor of Finjan issued by Citibank or another national lender of similar standing, on which Finjan can draw under the same terms as Finjan could proceed against a surety bond. Secure Computing has informed Finjan that a surety bond would cost Secure Computing an additional \$114,000.

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Pursuant to the Court's order, the parties respectfully request that the court issue an order or for a teleconference on the matter.

Respectfully,

/s/ Philip A. Rovner

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